UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

David Volz
General Manager
United States Cold Storage
1275 Medline Place
McDonough, Georgia 30253
dvolz@uscold.com

Dear Mr. Volz:

Enclosed is a copy of the final Inspection Report (Enclosure A) generated by the U.S. Environmental Protection Agency's Region 4 Air Enforcement Branch for the June 22, 2022, partial compliance inspection of United States Cold Storage, Inc., located at 1275 Medline Place, McDonough, Georgia 30253.

The EPA previously sent a copy of the draft inspection report in an email on July 22, 2022, allowing United States Cold Storage, Inc., to make any comments regarding the report and to claim any information contained in the report as confidential business information (CBI). In an email dated July 28, 2022, United States Cold Storage, Inc., notified EPA that no comments were being made and that no information was being claimed as CBI.

Should you have any questions regarding this inspection report, please contact me at (404) 562-9198, or by email at warrilow.phyllis@epa.gov.

Sincerely,

PHYLLIS WARRILOW

Digitally signed by PHYLLIS WARRILOW
Date: 2022.08.02 11:58:54 -04'00'

Phyllis Warrilow, PE
Environmental Engineer
South Air Enforcement Section

Enclosure

ENCLOSURE A
INSPECTION REPORT

United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report

I. GENERAL INFORMATION

Facility Name: United States Cold Storage, Inc.

Location (Address): 1275 Medline Place**,** McDonough, Georgia

Inspection Date: June 22, 2022

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation focused on the Clean Air Act (CAA) 112 (r)(1) General Duty Clause requirements of the ammonia refrigeration system.

ICIS-Air Number: 04000EPAR4COLD

EPA Region 4 Investigator(s)/Inspector(s):
1. Carrie Griffith, Environmental Engineer
2. Phyllis Warrilow, Environmental Engineer

State/Local Investigator(s)/Inspector(s):
1. Christina Jagonase, Georgia Environmental Protection Division

Person(s) Contacted at Facility (Name and Title):
1. David Volz, General Manager
2. Charles Smith, Chief Engineer
3. Daniel Merritt and Archie Robinson Assistant Managers

Report Prepared by: Phyllis Warrilow

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	NAICS 493120 – Refrigerated warehousing and storage
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	N/A
3. Air permit issuance date.	N/A
4. Air permit expiration date.	N/A
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	N/A
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	Clean Air Act § 112(r)(1)
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Ammonia refrigeration system
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	N/A

B. Process Description

United States Cold Storage, Inc. (Facility) in McDonough, Georgia is classified under NAICS code 493120, refrigerated warehousing and storage. The company provides storage and distribution of frozen food products. The facility has 9,600 lbs ammonia on site. The facility size is approximately 21.8 million cubic feet. The facility operates shipping and receiving of products. The facility employs 200 workers and operates 3 shifts daily.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	EPA Region 4 (R4) inspectors arrived at the Facility on June 22, 2022, at 10:33 AM EDT.
2. Credentials presented to facility personnel (include name and title).	Y	Inspectors presented their credentials to David Volz, General Manager, Daniel Merritt, Archie Robinson, Assistant Manager and Charles Smith, Chief Engineer

Activity	Yes No NA	Comments
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	Inspectors held an opening meeting on June 22, 2022, at 10:37 AM EDT during which the purpose and objectives of the inspection were explained. The opening conference was led by EPA inspector Phyllis Warrilow. Other opening meeting attendees were Carrie Griffith of EPA Region 4, and Christina Jagonase, GAEPD as well as members of United States Cold Storage management. Inspectors explained that they were conducting a Clean Air Act inspection specifically focused on the General Duty Clause requirements of the ammonia refrigerant system.
4. Discussed safety issues.	Y	Inspectors discussed Facility-specific safety and emergency procedures, including procedures for COVID-19 safety during the inspection. No personal protective equipment was required on site.

Activity	Yes No NA	Comments
5. Discussed which records to be reviewed.	Y	EPA inspectors requested to review the following records: - Piping and instrumentation diagrams for the ammonia refrigeration system - Hazard assessment for the ammonia refrigeration system - Standard operating procedures relating to the ammonia refrigeration system - Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system - Records of the most recent calibration or testing of any ammonia sensors/alarms -Pressure Relief Valve recertifications - Facility's emergency response plan or emergency action plan - Documentation of the total amount of ammonia in the refrigeration system
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	
7. Discussed facility policy regarding photographs or video (if applicable).	N/A	
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	
9. Discussed CBI.	Y	EPA inspectors indicated that any documents claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		

Activity	Yes No NA	Comments
10. The types of records reviewed, and the time period reviewed.	Y	EPA inspectors reviewed the following records during the inspection: -Piping and instrumentation diagrams for the ammonia refrigeration system. - Hazard assessment for the ammonia refrigeration system. - Standard operating procedures relating to the ammonia refrigeration system. - Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system. - Records of the most recent calibration or testing of any ammonia sensors/alarms. (Required every 6 months) -Records of Pressure Relief Valve recertifications. (Required every 5 years) - Facility's emergency response plan or emergency action plan. - Documentation of the total amount of ammonia in the refrigeration system.
Facility Walk-Through Observations		

Activity	Yes No NA	Comments
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	Compressors were operating at time of the inspection. Compressor SC2 was observed to be operating at a suction pressure of -3.6 PSIG and discharge of 139.6 PSIG at 12:11 p.m. on June 22, 2022. Compressor SC6 was observed to be operating at a suction pressure of -28.5 PSIG and discharge of 135.7 PSIG at 12:11 p.m. on June 22, 2022.
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. 13. Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	

Activity	Yes No NA	Comments
14. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
15. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	EPA inspectors observed ammonia detectors in the machine room. The facility operates 26 ammonia detectors. Documentation verifying monthly calibration records for all ammonia sensors was provided at 12:15 pm on 6/22/2022.

Activity	Yes No NA	Comments
17. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
18. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	
19. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
20. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N/A	
21. Were any visible emissions observed? (if yes, identify the location and equipment).	N/A	

Activity	Yes No NA	Comments
22. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N/A	
23. Was the cause of the visible emissions investigated and the information documented?	N/A	
24. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	
25. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
26. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N/A	

Activity	Yes No NA	Comments
27. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	
28. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N/A	
Closing Meeting		
29. Conducted a closing meeting.	Y	The closing meeting was conducted starting at 1:00 p.m. on June 22, 2022. Attendees were the same as were present for the opening meeting. This included employees, EPA R4 inspectors, and a Georgia Environmental Protection Division (GAEPD) inspector.
30. Summarize any additional information needed, if applicable?	N	Facility had all requested documents present at time of inspection.

Activity	Yes No NA	Comments
31. Accept a declaration of CBI, if applicable?	N/A	No documents were declared CBI.
32. Discussed observations.	N	1) The facility was relatively new with phase 1 construction complete in 2018 and phase 2 construction complete in January of 2021. 2) The Facility was able to produce the following records for the ammonia refrigerant system: - Process & Instrumentation Diagram - Hazard Assessment - Preventative Maintenance records - Calibration records - Facility Emergency Response Plan - Documentation of the total amount of ammonia in the refrigeration system - Standard Operating Procedures (SOPs) 3. Mechanical Integrity and Preventative maintenance were all kept on schedule and organized by computer. 4. All documents including PHA, Ammonia sensor calibrations, PSV recertifications and SOPs were organized and up to date.
33. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 60-day timeframe. Document requests were discussed.
34. Date and time inspection concluded.		On June 22, 2022 at approximately 1:10 PM EDT Region 4 inspectors left the Facility and concluded the inspection.

Activity	Yes No NA	Comments
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	No additional records are to be received from the facility as acknowledged above.

EPA Investigator/Inspector Signature: PHYLLIS WARRILOW Digitally signed by PHYLLIS WARRILOW Date: 2022.08.02 12:00:08 -04'00'

EPA Supervisor Signature & Title TODD GROENDYKE Digitally signed by TODD GROENDYKE Date: 2022.08.02 12:36:48 -04'00'

Date Report Finalized: August 2, 2022

APPENDICES AND ATTACHMENTS

Appendix A: Document Receipt Log

No documents were obtained from Facility representatives during the on-site inspection.